

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
Southern Division**

George Webb Sweigert,

Plaintiff,

-against-

**CASE: 2:20-cv-12933-GAD-KGA**

Cable News Network

Defendant.

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Non-party declarant  
D. G. SWEIGERT, C/O  
AMERICA'S RV  
MAILBOX, PMB 13339  
514 Americas Way, Box  
Elder, SD 57719  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

Plaintiff  
GEORGE WEBB SWEIGERT  
209 ST. SIMONS COVE,  
PEACHTREE, GA 30269-4201  
503-919-0748  
[Georg.webb@gmail.com](mailto:Georg.webb@gmail.com)

Jason Goodman  
252 7<sup>th</sup> Avenue #6s  
New York, NY 10001  
(323) 744-7594  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
Pro Se

Robin Luce Herrmann (P46880)  
Jennifer A. Dukarski (P74257)  
Javon R. David (P78214)  
BUTZEL LONG, a professional  
corporation  
Attorneys for Defendant Cable  
News  
Network, Inc.  
41000 Woodward Avenue  
Stoneridge West  
Bloomfield Hills, MI 48304 (248)  
258-1616  
[Luce-Herrmann@butzel.com](mailto:Luce-Herrmann@butzel.com)  
[Dukarski@butzel.com](mailto:Dukarski@butzel.com)  
[Davidj@butzel.com](mailto:Davidj@butzel.com)

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**DECLARATION OF D. G. SWEIGERT**

NOW COMES D. GEORGE SWEIGERT, *pro se* non-attorney third-party, to provide an accurate and truthful declaration of the events and persons that have become involved with the subject matter of this lawsuit.

Attached as EXHIBIT ONE is an accurate and truthful reproduction of the AMENDED COMPLAINT filed against Jason Goodman that chronicles George Webb Sweigert's involvement with Robert David Steele and Jason Goodman.

Attached as EXHIBIT TWO is an accurate and truthful reproduction of a blog article on Susan Holmes, former confidant of George Webb Sweigert and Jason Goodman.

Respectfully submitted on this December 2, 2021



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719  
Spoliation-notice@mailbox.org**

### **CERTIFICATE OF SERVICE**

I, hereby certify, under penalties of perjury, that a true copy of the accompanying documents has been filed electronically with pdf copies to all parties.

Jason Goodman  
truth@crowdsourcethetruth.org

George Webb Sweigert  
Georg.webb@gmail.com

L Robin Luce Herrmann (P46880)  
Jennifer A. Dukarski (P74257)  
Javon R. David (P78214)  
luce-Herrmann@butzel.com  
Dukarski@butzel.com  
Davidj@butzel.com

I hereby attest that the foregoing was transmitted December 2, 2021 under the penalties of perjury.



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

**EXHIBIT ONE**

**AMENDED COMPLAINT FOR CIVIL ACTION NO. 3:21-cv-573**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

KATHY STEELE, Administrator of the )  
Estate of Robert David Steele )  
-and- )  
EARTH INTELLIGENCE NETWORK )  
Plaintiffs, )  
v. )  
JASON GOODMAN )  
Defendant. )  
\_\_\_\_\_ )

Case No. 3:21-cv-573-JAG

**PLAINTIFFS DEMAND  
TRIAL BY JURY**

**AMENDED COMPLAINT**

Plaintiffs, Kathy Steele, Administrator of the Estate of Robert David Steele, and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to the Court’s Orders entered September 21, 2021 [*ECF No. 16*] and November 16, 2021 [*ECF No. 24*] and Rules 8(a) and 15 of the Federal Rules of Civil Procedure (the “Rules”), file the following Amended Complaint against Defendant, Jason Goodman (“Goodman”).

Plaintiffs seek (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in a sum to be determined by the Jury, (b) prejudgment interest on the principal sum awarded by the Jury from June 15, 2017 to the date of Judgment at the rate of six percent (6%) per year pursuant to § 8.01-382 of the Virginia Code (1950), as amended (the “Code”), (c) reasonable attorney’s fees pursuant

to § 18.2-500 of the Code, and (d) costs incurred – arising out of Goodman’s defamation, business conspiracy, and unauthorized use of name and picture in violation of § 8.01-40 of the Code.

## **I. PARTIES**

1. Plaintiff, Kathy Steele (“Kathy”), is the administrator of the estate of Robert David Steele, deceased. Kathy is a citizen of Virginia. She was Robert’s wife. She lives in Oakton, Virginia. Robert died on August 28, 2021.

2. From 1975 to 1979, Robert served in the United States Marine Corps as an officer variously assigned to infantry, intelligence and security/personnel duties in Asia and the United States. Following his service as a Marine, Robert remained in the Marine Forces Reserve until 1996 as an adjunct faculty member at Marine Corps University and developer of the Marine Corps Master Intelligence Plan, ultimately attaining the rank of Major. In 1979, he joined the Central Intelligence Agency (“CIA”) as an operations officer. As a CIA operations officer, Robert obtained a Top-Secret Security Clearance. Robert resigned from the CIA in 1988 to accept an invitation from the Marine Corps to establish the Marine Corps Intelligence Center as a GM-14 civil servant, where he remained until 1993. In 1993, Robert formed Open Source Solutions, Inc., a pioneering open source intelligence (“OSINT”) firm. OSINT is a term used to refer to data collected from publicly available sources to be used in an intelligence context. In the intelligence community, the term “open” refers to overt, publicly available sources (as opposed to covert or clandestine sources). Robert was Chief Executive Officer of Open Source Solutions. For over twenty (20) years, Robert dedicated himself to teaching individuals and organizations about the value of open source intelligence, holistic analytics, and true

cost economics and open source engineering. Robert’s education, experience, and publications, awards and recognitions are extensively catalogued on his websites, <http://robertdavidsteele.com/> and <https://phibetaiota.net/>. Robert’s work has been universally commended. In January 2017, because of his leadership in redirecting the craft of intelligence away from spies and secrecy enabling war and waste towards open sources and methods favorable to peace and prosperity, Robert was nominated for a Nobel Peace Prize. The full text and active links to the nomination were published at the request of Jan Helge Havlik (“Havlik”), Editor-in-Chief of *Defence and Intelligence Norway*, and are/were at all times available on Robert’s website. [<https://phibetaiota.net/2017/01/nomination-for-the-nobel-peace-prize-robert-david-steele/>; <https://phibetaiota.net/2017/02/jan-h-kalvik-intelligence-the-nobel-prize-recommendation-of-robert-david-steele-for-information-peacekeeping-peacekeeping-intelligence/>]. Robert was especially proud of the *NATO Open Source Intelligence Handbook*, published in 2001. Robert wrote over 85% of the Handbook. In a preface to the Handbook, General W. F. Kernan, General, U.S. Army (“General Kernan”), acknowledged that the publication “has benefited greatly from the continued collaboration between my staff and the staff of Open Source Solutions Inc. [*i.e.*, Robert]”. [<https://phibetaiota.net/wp-content/uploads/2009/07/NATO-OSINT-Handbook1.pdf>].<sup>1</sup>

Until publication and republication of Goodman’s videos, tweets, emails and other statements at issue in this action, Robert enjoyed an untarnished reputation.

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<sup>1</sup> Goodman visited and reviewed the contents of Robert’s websites prior to publishing the false statements at issue in this case. Goodman knew, therefore, that Robert had been nominated for a Nobel Peace Prize and that he was the primary author of the NATO OSINT Handbook.

3. Plaintiff, Earth Intelligence Network (“EIN”), is a Virginia not-for-profit, 501(c)(3) corporation founded by Robert in 2006 (Virginia State Corporation Commission ID # 0670760-8) (Federal EIN # 20-828XXXX). It is active and in good standing. One of EIN’s projects was called “#UNRIG”. #UNRIG was an educational campaign to communicate to all citizens the possibility of an ethical, legal, non-violent restoration of integrity to the United States Government. In June 2017, the core team members of EIN were Robert and Dr. Cynthia Ann McKinney (“Dr. McKinney”). Dr. McKinney is first black woman to be elected to Congress from Georgia. She is internationally-recognized as a humanitarian and anti-war activist.

4. Goodman is citizen of New York. He owns, maintains and operates multiple Internet and social media properties, including YouTube channels and a Twitter account. The name of Goodman’s social media properties is “Crowdsourcing The Truth” (“CSTT”). Goodman uses his YouTube channels and videos, Facebook page, Twitter, Periscope, Patreon and Subscribestar accounts to advertise the for-profit business of CSTT and for purposes of trade. Goodman solicits donations, advertises products and derives substantial revenue from donors, subscribers, viewers, patrons and followers in Virginia and elsewhere who watch the videos he uploads to his YouTube channels, Twitter and other social media accounts. Goodman’s websites and various accounts, including <https://crowdsourcethetruth.org/>, are active. Goodman’s videos target subscribers, users, patrons and viewers located in Virginia and elsewhere. Goodman and his agents were physically present in Virginia on multiple occasions in connection with the production of YouTube videos at issue in this case.



## **II. JURISDICTION AND VENUE**

5. The United States District Court for the Eastern District of Virginia has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

6. Goodman is subject to personal jurisdiction in Virginia pursuant to Virginia's long-arm statute, § 8.01-328.1(A)(1) and (A)(4), as well as the Due Process Clause of the United States Constitution. Goodman targeted a Virginia citizen and a Virginia non-profit, and has engaged in a persistent, continuous and ongoing course of defamation that injured Plaintiffs in Virginia. Goodman has minimum contacts with Virginia such that the exercise of personal jurisdiction over him comports with traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution. The general thrust and content of Goodman's videos and tweets – which he produced, directed, spoke in, edited and published on platforms he operates – manifests an intent to target and focus on Robert and EIN, and direct content to a Virginia audience. The focal point of Goodman's accusations of "felony charity fraud" was an event that occurred in Oakton, Virginia. The brunt of the harm, in terms of both Robert's emotional distress and injury to Robert and EIN's business and reputations, was suffered in Virginia, where Robert lives and works. Plaintiffs' claims directly arise from and relate to Goodman's publication of false and defamatory statements in Virginia.

7. Venue is proper in the Eastern District of Virginia pursuant to 28 U.S.C. § 1391(b)(1) and § 1391(b)(2).

### III. STATEMENT OF THE FACTS

8. Robert and EIN have never had agents or employees, professional fundraisers, or fund-raising counsel in New York. They have never had an office or mailing address in New York. They never solicited donations from residents of New York by telephone, over the Internet, by direct mail or otherwise. Other than one speaking engagement, Robert was never physically present in New York in 2017 for any reason.

9. On June 13, 2017, Robert met CSTT agent George Webb (“Webb”) at the Kob Kun Thai restaurant in Oakton, Virginia, to do an interview. Goodman and Negrón live-streamed the interview, which Goodman simultaneously published on his YouTube channel, CSTT: <https://www.youtube.com/watch?v=hMJoAO5OZY8&feature=youtu.be>.

10. During the live-stream, Robert shared his views on 9/11, pedophilia and the purpose of #UNRIG. During the live-stream Goodman NOT Robert, solicited donations to help with the #UNRIG campaign. [See, e.g., Video at 10:14 – “We would love to help you with that”; *id.*, Video at 13:47 – “I want everybody to retweet that #UNRIG”; *id.*, Video at 37:19 – “for people who are just joining, I’m going to include in the comments again the URL for the UNRIG Indiegogo”; *id.*, Video at 38:33 – “if every one of our thousand-plus viewers will donate \$25, we can really move the needle on this thing”; *id.*, Video at 50:44 – “Everyone should still keep going [to] that URL to get involved with the movement and donate to the Indiegogo campaign”].

11. On June 13, 2017, EIN received a total of \$9,827.01 in donations from 175 donors. There is no way of knowing who, if anyone, donated money to EIN because of Goodman’s live-stream. Only *one (1)* person who donated to EIN on June 13, 2017

identified themselves as living in New York. That person donated \$50. In all of 2017, EIN's gross contributions from persons who identified themselves as living in New York were only \$2,751.

12. Because Robert and EIN did not do business, hold property or otherwise conduct activity in the State of New York and because EIN's gross contributions in 2017 were less than and would continue to be less than \$25,000 per year from the State of New York and EIN did not and would not use the services of a professional fundraiser or fund raising counsel, EIN was not required to register as a charitable organization with the New York attorney general pursuant to the Codes, Rules and Regulations of the State of New York, including article 8 of the Estates, Powers and Trusts Law ("EPTL") [*see NY EPTL* § 8-1.4(a)(3)] or article 7A of the Executive Law [*see NY Exec.* § 172-a(2)(d)]. [<https://www.charitiesnys.com/pdfs/Regs-F.pdf>].

13. At all times relevant to this action, Goodman knew that there was no basis in fact or law for any claim that Robert or EIN had committed "felony charity fraud". There has never been any criminal action commenced against Robert or EIN, no investigation of any sort by anyone and, to be sure, no allegations of criminal conduct by anyone (except Goodman). Goodman had no probable cause to believe that Robert or EIN committed any crimes as evidenced, *inter alia*, by the fact that he never reported Robert or EIN to the NY Attorney General or to any law enforcement agency or regulatory authority.

14. On June 14, 2017, Goodman published a video on YouTube entitled, **"Clear and Present Danger (Calm Before the Storm?) #maerskmemphis"**. In the video, Goodman and Negrón claimed that Webb had "intel" from a source identified as

“Deep Uranium”, indicating a “strong possibility of Clear and Present Danger due to illicit radiological material on board” transoceanic container ship, Maersk Memphis. Goodman and Negron encouraged the “Crowdsource community” to spring into action and alert the United States Coast Guard that there was a “dirty bomb” aboard the Maersk Memphis. Goodman told CSTT subscribers to “[c]all the port authority – that’s an excellent idea. Someone call the port authority there – in Charleston.” Someone, in fact, called in the putative dirty bomb threat, which caused a terminal at the Port of Charleston, South Carolina, to be shut down.

15. In truth, there was no “intel”. The dirty bomb was a hoax. The Federal Bureau of Investigation (“FBI”) immediately opened an investigation into the false report of a dirty bomb aboard the Maersk Memphis.

16. Robert learned about the “dirty bomb” hoax, and chose to distance himself from Goodman, Negron and CSTT. Robert immediately canceled an interview with Goodman and Negron planned for June 15, 2017. Robert informed Goodman by private email that he (Robert) no longer wanted anything to do with Goodman and CSTT as a result of Goodman’s involvement in the dirty bomb hoax.

17. Upon receipt of Robert’s email, and in retaliation and reprisal for Robert’s decision to no longer have anything to do with Goodman and CSTT, Goodman, in combination and concert with Negron, Holmes and others, began an unprecedented social media smear campaign against Robert and EIN that continues to this day. Goodman’s videos were scripted ahead of time. He and Holmes and Negron discussed the subject matters and content via email, telephone, text message and/or direct message. They agreed upon the storyline/thesis, theme and tone. They appeared and spoke on screen

together, with one voice (“we”), and a shared common purpose as evidenced by their language and visual expressions. The videos clearly evince a joint effort to injure Robert and EIN’s business and reputations.

**A. Defamation – PART ONE**

18. Between June 15, 2017 and August 30, 2017, Goodman, Negrón and Holmes, acting in concert (most times together on camera), published and republished false and defamatory statements of or concerning Robert and EIN, including:

- a. “We made a big mistake with Robert David Steele ... We’ve<sup>2</sup> raised a lot of money for him. We need to apologize to you guys for doing that”.
- b. “Everyone should just go directly to their credit card company and cancel the charge and if there are financial crimes experts out there I’d like to know if its legal for Mr. Robert David Steele to make up lies about me ... and spread these lies to our viewers”.
- c. “Trish – I’m glad you mentioned stealing, because you’ve just reminded me of something – particularly the robber David Steele ... Many of our viewers have expressed real anger at feeling tricked by the campaign from Robert David Steele. And I assure you, we were tricked by him as well”.
- d. Goodman repeatedly called Robert the “robber David who Steals”, the “robber David who Steals from our audience ... and puts out false information”. In one video, Goodman falsely accused Robert of “stealing” from the CSTT audience three times.

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<sup>2</sup> During the June 13, 2017 interview in Virginia and in many videos thereafter, Goodman admitted that CSTT (“we”) had solicited the donations. Goodman’s subsequent and incorrect representations – repeated in 2017, 2018, 2019 and 2020 – that *Robert and EIN* had committed “felony charity fraud” by soliciting donations in New York was knowingly false and was made with actual malice. *See Nunes v. Washington Post*, 2021 WL 3550896, at \* 5 (D. D.C. 2021) (“A newspaper’s *own* prior (and correct) reporting that is inconsistent with its later (and incorrect) reporting could certainly give the paper reason to seriously doubt the truth of its later publication—just as a source’s pre-publication recantation may be evidence that a publisher had reason to doubt the source’s original claims.”).

- e. “I think he’s just a cheap con man ... He knows it’s a useless campaign he’s just trying to suck \$250,000 out of people ... I think he’s involved in a pretty serious financial scam. Uh, I think that there’s a possibility that a Rico charge could be involved because he has Defango with him. I think that he’s uh defrauding people across state lines. I mean I’m not a lawyer of course, but it seems like he is doing things that are very criminally actionable ... You know I’m obviously not a mental health professional but it certainly seems he’s got some kind of schizophrenic behavior there ... Its people who are sick and tired of people like Robert David Steele. The robber David who Steals.” Holmes stated, “Oh man, I get it. He’s really conning people”
- f. “What Google helped him do was to file privacy complaints for videos that we have that include evidence of Robert David Steele committing fraud ... [Google] helped me. When I typed in, is Robert David Steele a lying moron? and the answer came back yes ... I want to show what a fraudster this individual is.”
- g. “this gentleman [referring to Robert] came on your show and he deceived 10,000 people to donate \$15,000 ... he committed interstate wire fraud”, to which Goodman replied, “I’ve suspected that from the beginning, yes”.
- h. “[h]opefully, the FTC or some other law enforcement body will, can take this over and prosecute him [referring to Robert] with criminal charges”.
- i. “I find it really difficult to believe that he was ever in the CIA because he just seems so fucking stupid ... he’s engaged in an operation to compromise Cynthia McKinney and basically co-opt her credibility<sup>3</sup> and ... destroy her reputation.”
- j. On August 11, 2017, Goodman published the following email to Dr. McKinney:

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<sup>3</sup> In his videos, Goodman repeatedly accused Robert of “co-opting” the credibility of people to hide or conceal fraud or further alleged schemes.

“From: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
 Subject: Your association with Robert David Steele

Dr. McKinney,

Both myself and George Webb have made several attempts to contact you, but have not received a direct response. I hold you in very high regard and I am slightly confounded by your decision to align with Robert David Steele. In my estimation he has repeatedly made ignorant and even racist comments, has defrauded my audience of money, has personally and publicly insulted me and is actively attempting to co-opt your credibility to raise funds. I would really appreciate it if you would agree to an interview via Skype to address these concerns. Many people in our audience have concerns about your association with RDS given his ongoing abusive behaviors documented in a number of videos. Thank you for your consideration, I await your response.”

- k. “I really want Trish and you and I to really collaborate on this going forward ... I just want to make the statement that it is my assessment that Robert David Steele and Cynthia McKinney have a pay-to-play operation going on ... the UNRIG scam. It’s a total scam ... That’s what it needs to be called because that’s what it is ... Cynthia McKinney knows that RDS is soliciting donations in her name to pay off her student loans, taxes, and to provide some type of compensation ... Robert David Steele is the architect of all the scam and has promoted and stated many, many lies, constantly. He consistently lies.”
- l. “this kind of person [referring to Robert] is a danger to the alternative news community and he has been operating for way to long ... We want him to be gone now”.
- m. “Now I want to clarify something because we’re<sup>4</sup> not doing this to be vindictive, we’re not doing this because we dislike Robert David Steele, although I personally do. We’re doing this because [laughter] ... Robert David Steele’s behavior represents the exact same type of fraud that sucks out money from the population. He’s lying. He’s, you know, representing that he’s going to do this Election Reform Act, but as Queen Tut has pointed out, there’s evidence that he has made no effort to do that and in fact has misrepresented efforts that he has claims to have made, which he clearly has not”.

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<sup>4</sup> The specific pronouns (“we”) and identical language employed by Goodman, Negron and Holmes demonstrates that they were acting in concert and that they harbored spite, ill-will and actual malice towards Robert and EIN.

- n. “So this is what we’re doing to sort of take some power away from Robert David Steele and disallow him from cheating people like this ... It’s another example of someone co-opting the credibility, Robert David Steele co-opting the credibility of Cynthia McKinney who is someone a lot of people trust.”
- o. “And this is the nail in the coffin for Robert David Steele’s platform for being the Open Source guy. He is not the open source guy, he never has been ... He’s created a scam for many many years and he’s been defrauding people for a very long time ... Cynthia McKinney is also a fraud too. She is willing to associate with Robert David Steele ... and she’s only getting trips here to the US based on these fraudulent donations to this fraudulent UNRIG scam, and she knows its fraudulent ... Everybody can go look at the UNRIG.net. We suggest you do it. We suggest you look at Robert David Steele’s UNRIG information. Look at all of it. We want everyone to do that, so you can see their whole drive is to get their hands on these corrupt Congressman and have them do this pledge”.
- p. “No, he’s a serious con man, but I mean the bigger point being, you know that this is a serious fraud. I mean that it is a fraud. No question.”

**B. Defamation – PART TWO**

19. On September 1, 2017, Robert and EIN filed suit against Goodman, Negron and Holmes. [*Steele v. Goodman*, Case 3:17-cv-601]. In and by their complaint, Robert and EIN expressly and unequivocally notified Goodman that his statements about “felony charity fraud”, “fraud”, “stealing”, etc., were false and defamatory. Goodman intentionally ignored this notice. Instead, in spite of the Federal Court complaint, Goodman and his associates continued to publish and republish the false and defamatory statements with actual malice. *See Nunes v. Lizza*, 12 F.4<sup>th</sup> 890, 901 (8<sup>th</sup> Cir. 2021) (“Republication of a statement after the defendant has been notified that the plaintiff contends that it is false and defamatory may be treated as evidence of reckless disregard.”) (quoting Restatement (Second) of Torts § 580A cmt. d (Am. L. Inst. 1977));



*see id. Castellani v. Scranton Times, L.P.*, 633 Pa. 230, 124 A.3d 1229, 1235 (2015) (same) (further citations omitted).

20. Between September 1, 2017 and December 25, 2017, Goodman and Holmes continued to act together and with others, in concert and in furtherance of the conspiracy to defame Robert and EIN. Goodman and Holmes published and republished the following false and defamatory statements:

- a. “This is the key I know it’s very difficult for Robert David Steele’s thick skull and dense brain to absorb information. It’s a side effect of being a total moron, but the fact is when you accuse someone of fraud and you present evidence of fraud that is called journalism; that is called exposing fraud”.
- b. “Queen Tut, let’s examine some of the financials for Robert David Steele’s Earth Intelligence Network ... [W]e’re learning quite a lot about how charletans can take advantage of the various loopholes and just you know straight out commit fraud with these 501c3’s ... Robert David Steele is constantly lying about the facts of everything that’s gone on from the time that he met us until today.”
- c. “Is it because he’s an honest guy who wants to reveal the truth or is it because he is a deceptive fraudster allegedly who wants to trick people into thinking he’s running a 501c3 that’s going to create election reform when in fact all he’s doing is trying to raise money so he can buy RVs so he can crash them and buy soft drinks and give gifts”.
- d. RDS is a disinfo agent ... Robert David Steele is a very nasty person and that man has done more for taking down really good people ... [W]e are going to make sure and we’ve already done a lot by exposing your numerous frauds ... You’ve been twisting people’s minds for a very very long time ... He is not a good guy ... I thought you were going to say Robert David Steele is a sociopath and it’s my opinion that he might well be that [Goodman chuckles]”.
- e. “this is these guys taking a page right out of the book of all the crooks and criminals that we are trying to expose, whether it’s the Clinton Foundation and all of their felonious activity that I speak about every Sunday on Sunday with Charles with Charles Ortel or you know the very activities of Robert David Steele himself.”

- f. On September 30, 2017, Goodman and Holmes produced and published a video on YouTube entitled, “**#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals**”. The Goodman/Holmes video opens with a frightening still shot of an exploding RV. Goodman and Holmes describe the video as follows: “Crowdsource the Truth addresses Robert David Steele’s fraudulent 501c3 Earth Intelligence Network.” Holmes accuses Plaintiffs of “charity fraud ... we’re going to go into the charity fraud related to the Earth Intelligence Network ... there is charity fraud here okay that’s a fact”.
- g. “we’re bringing this information forward because if someone tries to take a tax deduction on their donation to the Earth Intelligence Network, they themselves could be in legal jeopardy ... This is a public service announcement to members of the crowdsource community who have been victims of fraud – fraud executed by Robert David Steele”.

**C. Defamation – PART THREE**

21. The relationship between Goodman and Holmes ended in late December 2017 on unfriendly terms.

22. Goodman continued the smear campaign against Robert and EIN. Since December 25, 2017, Goodman has published numerous false and defamatory statements and insulting words about plaintiffs in videos uploaded to YouTube and in emails, including the following:

- a. “well I certainly can’t immediately think of anyone like that who might be lying about things constantly and you know spreading disinformation [as Goodman makes this statement, he displays a picture of Robert]”.
- b. “We’ve seen buffoons like Robert David Steele, who people tell me actually did work for the CIA, but he seems to be running a number of frauds. I’ve pointed to evidence where he’s doing charity fraud”.

- c. “when I tell you and the rest of the people in the crowdsource community that Robert David Steele is a fraud, I say that because I have evidence that he’s committed charity fraud ... [a]m I lying Joe? Have I fabricated this information with the specific intent of defaming this robber who steals. This fraud [forcibly pointing at and referring to Robert] ... this tiny man who goes on the Internet and deliberately lies, okay. Robert David Steele is also fundamentally a fraud because he behaves in a consistently fraudulent way ... lying miscreant”.
- d. “Robert David Steele came on my program. In the course of about an hour or two, our audience raised \$15,000 for this charitable organization [Earth Intelligence Network] a 501c3, tax exempt charity. Now there’s a lot of laws that govern the operations of these 501c3s ... and in addition to being registered as a tax-exempt organization, these types of charities need to be specifically registered in each state they operate in. You can’t just go around soliciting funds in New York without being registered with the New York State Bureau of Charities ... I have evidence that this person’s 501c3 organization is operating fraudulently in the state of New York. The lack of registration with the New York State Bureau of Charities indicates that the solicitation of two hundred and fifty thousand dollars in the state of New York over the Internet is felony charity fraud”.
- e. “#EarthIntelligenceNetwork #FelonyFraud #LockUpRDS”.

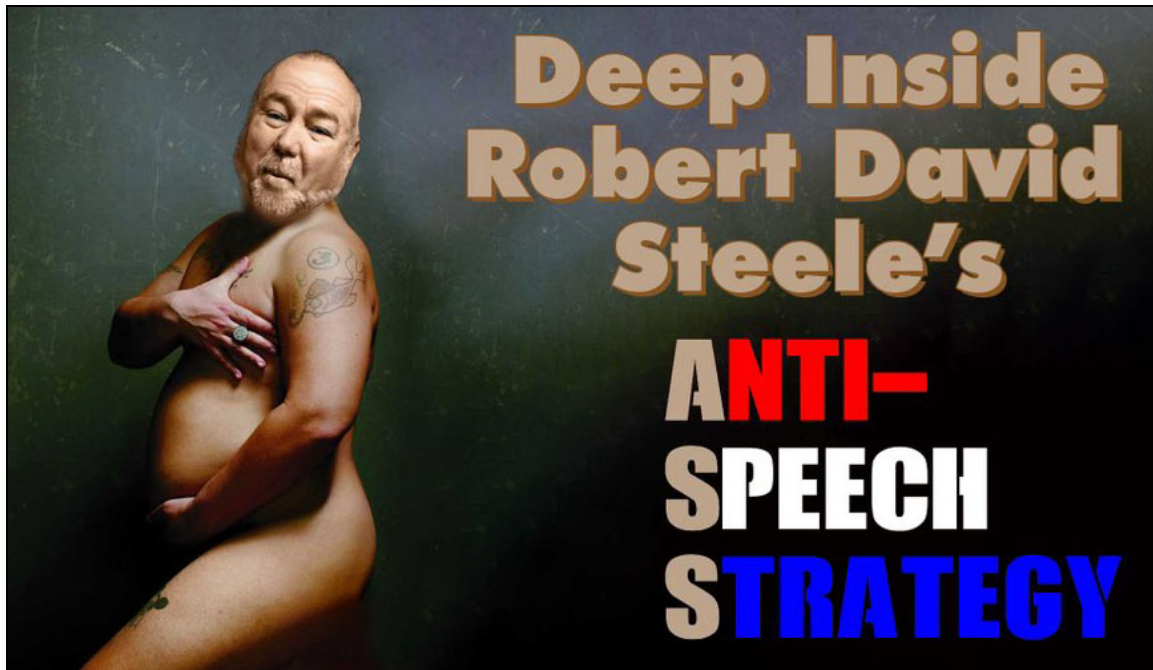
**D. Defamation – PART FOUR**

23. Between May 17, 2018 and the present, Goodman has published another twenty (20)+ videos containing the same or similar false, derogatory, disparaging, defamatory and insulting statements, implications and insinuations about Robert and EIN, including accusations of “felony charity fraud”, tax fraud, “fraud”, “perjury”, commission of a “crime”, conduct that would subject Plaintiffs to “prison”, “perpetration” of “this dirty bomb hoax .. [that] is ultimately aimed at helping to take down President Trump”, conspiracy, “psychological operation[s]” to “co-opt” people, “deceptive” operations, “persistent” lying (“he lied about being nominated for the Nobel Peace Prize”). Goodman went out of his way to defame Robert to third-parties.

24. In addition to the YouTube videos, Goodman published the following email:

----- Forwarded message -----  
 From: **Jason Goodman** <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>  
 Date: Wed, Nov 21, 2018 at 7:07 AM  
 Subject: Re: LinkedIn not allowing post  
 To: bijaya kumara das brian d grover <[groveev@yahoo.com](mailto:groveev@yahoo.com)>  
 Cc: [sgtreport@gmail.com](mailto:sgtreport@gmail.com) <[sgtreport@gmail.com](mailto:sgtreport@gmail.com)>, NBC Kntv San Francisco <[newstips@nbcbayarea.com](mailto:newstips@nbcbayarea.com)>, [contact@neilkeenan.com](mailto:contact@neilkeenan.com) <[contact@neilkeenan.com](mailto:contact@neilkeenan.com)>, [lionel@lionelmedia.com](mailto:lionel@lionelmedia.com) <[lionel@lionelmedia.com](mailto:lionel@lionelmedia.com)>, [fieldmcc@yahoo.com](mailto:fieldmcc@yahoo.com) <[fieldmcc@yahoo.com](mailto:fieldmcc@yahoo.com)>, Donald J. Trump <[email@conservativeintel.com](mailto:email@conservativeintel.com)>, Coast To Coast Am <[george@coasttocoastam.com](mailto:george@coasttocoastam.com)>, [petitics@gmail.com](mailto:petitics@gmail.com) <[petitics@gmail.com](mailto:petitics@gmail.com)>, [jrlc@yahoo.com](mailto:jrlc@yahoo.com) <[jrlc@yahoo.com](mailto:jrlc@yahoo.com)>, [davidseamanshow@protonmail.com](mailto:davidseamanshow@protonmail.com) <[davidseamanshow@protonmail.com](mailto:davidseamanshow@protonmail.com)>, [robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com) <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>  
  
 Robert David Steele is an absolute fraud and the fact that Sean at SHT Report would have him on puts his integrity in question.

25. Goodman continued to insult and disparage Robert even after Robert died. After he heard rumors of Robert's death, Goodman tweeted the following cruel and unnecessary statements: "As delighted as I was to hear the news, Robert David Steele's death remains unconfirmed. He is far to [sic] duplicitous to be believed in the absence of a death certificate, obituary, tomb stone or official announcement from his doctor, his family or his attorney. Who can confirm?" "No credible source can confirm Robert David Steele's death. As much as I would like it, this seems to be a 'anti-vaxxers are dying' hoax. Steele was/is a perpetual hoaxer & conman in my opinion." Goodman went so far as to say that "Robert David Steele (if truly dead) in my well informed opinion was a conman and a liar. He actively sought to harm others with his deceit and rob them of their money. Death is getting off easy for that piece of human garbage." [<https://twitter.com/csthetruth/status/1432142515365416960>]. Goodman even went so far as to create and published the following vulgar and inhuman meme:



26. Goodman, Negron and Holmes's false and defamatory statements (detailed above) devastated Robert and destroyed the business of the EIN. At a financial level, Robert and EIN lost sponsors and were forced to refund donations because of Goodman, Negron and Holmes' false claims of "fraud", "stealing", "scam", etc. Donations to the #UNRIG campaign prior to Goodman, Negron and Holmes's defamation totaled over \$29,200 per month and were trending higher. Because of Goodman, Negron and Holmes's defamation and insulting words, monthly donations to EIN's business dwindled to around \$200 by November 2017.

#### **COUNT I – DEFAMATION**

27. Plaintiffs restate paragraphs 1 through 26 of this Amended Complaint, and incorporate them herein by reference.

28. Goodman, Negron and Holmes published and republished to third-parties – including, without limitation, CSTT YouTube subscribers, Goodman's followers on Twitter (@csthetruth) and Periscope, CSTT's Facebook followers, and patrons of CSTT

on Patreon and Subscribestar – numerous false factual statements, which are detailed verbatim above, of or concerning Robert and EIN.

29. Goodman, Negron and Holmes’s statements are materially false because Robert and EIN did not solicit charitable donations from persons in New York and did not commit charity fraud, knowingly or unknowingly, or fraud of any kind on any person, ever. The representations on Robert’s website are truthful and accurate. Robert wrote the NATO Open Source Handbook. Robert was nominated for the Nobel Peace Prize. Robert and EIN did not ever steal or embezzle anything, including donations, from anyone.

30. Goodman’s publications and republications occurred without privilege of any kind.

31. Negron and Holmes published false and defamatory statements in furtherance of a joint scheme with Goodman to defame Robert and EIN. Goodman is liable for Negron and Holmes’s tortious acts. *Pinkerton v. United States*, 328 U.S. 640, 646-647 (1946); *id. McFarland v. McFarland*, 684 F.Supp.2d 1073, 1085 (N.D. Iowa 2010); *In re Orthopedic Bone Screw Products Liability Litigation*, 1997 WL 186325, at \*17 (E.D. Pa. 1997).

32. Goodman, Negron and Holmes’s false statements constitute defamation *per se*. The statements accuse and impute to Robert and EIN the commission of numerous felonies and crimes involving moral turpitude and for which Robert and EIN may be punished and imprisoned in a state or federal institution. The statements impute to Robert and EIN an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or

employment. Goodman, Negron and Holmes's statements also prejudice Robert and EIN in their profession or trade.

33. Goodman, Negron and Holmes's false statements permanently and irreparably harmed Robert and EIN and their reputations.

34. Goodman, Negron and Holmes acted with actual malice and reckless disregard for the truth:

a. Goodman, Negron and Holmes intentionally set out to destroy Robert and EIN's reputation with falsehoods. The false and defamatory statements in the YouTube videos, tweets, and retweets were published in retaliation and reprisal for Robert's decision on June 15, 2017, following the dirty bomb hoax, to have nothing to do with Goodman or CSTT.

b. Goodman, Negron and Holmes's statements were knowingly false, with not a shred of supporting evidence. Goodman, Negron and Holmes unequivocally accused Robert and EIN of committing "felony charity fraud", even though (i) Goodman, Negron and Holmes knew that Goodman had solicited the donations on June 13, 2017, and (ii) Goodman, Negron and Holmes did not know the legal elements of a charge of felony charity fraud or even if there were such a charge, did not know whether Robert and/or EIN had ever or could ever commit such a crime, and in spite of the fact that no criminal or civil complaint had ever been made by any person, no charges had ever been brought, no arrests made, and no findings had ever been made by any Court or Tribunal that Robert or EIN had committed any crime. Moreover, from their constant review of Robert's websites, Goodman, Negron and Holmes knew that Robert and EIN fulfilled



every commitment made to donors and did not "steal" anything. Every donor to #UNRIG, including Goodman and Holmes received a certificate as a Founding Citizen:



Goodman, Negron and Holmes knew and acknowledged in videos that Robert and EIN (a) advocated and actively promoted the mission of #UNRIG and communicated with all donors; (b) accounted for every penny spent in a budget that was posted online, <https://www.unrig.net/budget-report/>; (c) honored all requests for refunds of donations; (d) offered a free #UNRIG store and ideas for do-it-yourself merchandise, such as t-shirts, posters, bumper stickers, and other items; (e) acquired and professionally wrapped an RV, and began a national tour of the Country in furtherance of the "Summer of Peace" campaign; and (f) published and appeared in multiple video interviews to promote the #UNRIG campaign. Goodman's own videos, including **UNRIG Cynthia McKinney**, demonstrate that he actively reviewed Robert's websites and learned all about the #UNRIG campaign, including Plaintiffs' use of an RV as part of the "Summer of Peace" tour. The #UNRIG campaign was fully disclosed in all material respects on the website [www.unrig.net](http://www.unrig.net). Goodman knew that Robert and EIN were engaged in a legitimate full-



time effort to unrig the system, “to restore integrity and truth to governance, with the informed will and wisdom of We the People at its heart”, and “to enjoy a transparent government by 2022, that operates with honesty, respecting our planet and the human spirit, so that we may create a healthy, prosperous America rooted in truth with peace as our shared condition”. Despite their actual knowledge to the contrary, Goodman, Negron and Holmes published false and defamatory statements that #UNRIG was a “scam” and that Robert and EIN were defrauding and stealing from donors. Goodman, Negron and Holmes also intentionally ignored online evidence, such as General Kernan’s Preface to the NATO Open Source Handbook, that proved their statements about Robert were false.

c. Goodman, Negron and Holmes made up facts out of whole cloth. They did not act in good faith because, in the total absence of evidence, they could not have had an honest belief in the truth of their statements about Robert and EIN.

d. Goodman, Negron and Holmes chose to manufacture and publish false and scandalous statements and use unnecessarily strong and violent language, disproportionate to the occasion. Indeed, in multiple videos Goodman, Negron and Holmes expressed clear and convincing feelings of contempt, ill-will and animus towards Robert and EIN and the intent to injure Robert and EIN through knowing falsehoods.

e. Goodman, Negron and Holmes reiterated, repeated and continue to republish their false defamatory statements, and enticed others to do so, after being notified by Robert and EIN that the statements were false and defamatory, out of a desire to hurt Robert and EIN and to permanently stigmatize and destroy Robert and EIN.

35. As a direct result of Goodman, Negron and Holmes’s defamation, Robert and EIN each suffered presumed damages and actual damages, loss or injury to business,

pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, injury to reputation, prestige and standing, costs, expenses and out-of-pocket loss in the sum of \$1,000,000 or such greater amount as is determined by the Jury.

## **COUNT II – BUSINESS CONSPIRACY**

36. Plaintiffs restate paragraphs 1 through 35 of this Amended Complaint, and incorporate them herein by reference.

37. Beginning in June 2017 and continuing through December 25, 2017, Goodman, Negron and Holmes combined, associated, agreed or acted in concert together and with others, including Scott Creighton,<sup>5</sup> for the express purpose of injuring EIN and #UNRIG in its business and reputation through the publication and republication of false and defamatory statements. In furtherance of the conspiracy and preconceived joint plan, Goodman, Negron and Holmes orchestrated a scheme the unlawful purpose of which was to defame Robert and EIN and destroy their reputations and business. Acting in concert, Goodman, Negron and Holmes utilized email, text messages, the Internet and various social media properties, including YouTube, Twitter, Facebook, and Patreon, to publish, republish and spread the defamation and character assassination.

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<sup>5</sup> Goodman invited Creighton on his show many times. Creighton, who operates the YouTube Channel, “AmericanEveryman”, repeated and republished the same false and libelous allegations about fraud, theft and other wrongdoing by Robert. At Goodman’s direction, Creighton posted the following words together with one of his videos: “I am so sick of snake oil salesman Robert David Steele but he keeps showing up on all these alternative left-leaning news programs and not a damn one of these interviewers actually interviews the fucker. They’re infomercials for the prick and his #UNRIG scam. It makes me sick.”

38. Goodman, Negron and Holmes acted intentionally, purposefully, without lawful justification, and with the express knowledge that they were injuring the #UNRIG campaign and EIN.

39. Goodman, Negron and Holmes's actions constitute a business conspiracy in violation of § 18.2-499 of the Code.

40. As a direct result of Goodman, Negron and Holmes's misconduct, EIN suffered damage and loss, including, but not limited to, injury to its business, trade and professional reputation, loss of prestige and standing, reasonable attorney's fees, court costs, and other damages in the sum of \$1,000,000.00 or such greater amount as is determined by the Jury.

41. In accordance with § 18.2-500 of the Virginia Code, EIN seeks three-fold the damages by it sustained as determined by the Jury.

**COUNT III – UNAUTHORIZED USE OF NAME AND PICTURE (§ 8.01-40)**

42. Plaintiffs restate paragraphs 1 through 41 of this Amended Complaint, and incorporate them herein by reference.

43. Between 2017 and the present, Goodman knowingly used Robert's name and picture without having first obtained Robert's written consent for advertising purposes and for purposes of trade. Throughout his video productions, Goodman used Robert's name and picture to generate business for CSTT (*i.e., merchandise sales, donations, increased subscribership, and monetization of CSTT's YouTube Channel*). In each video, Goodman solicits financial contributions and subscriptions.

44. Robert was never asked and never consented to Goodman's use of his name or picture for any reason.

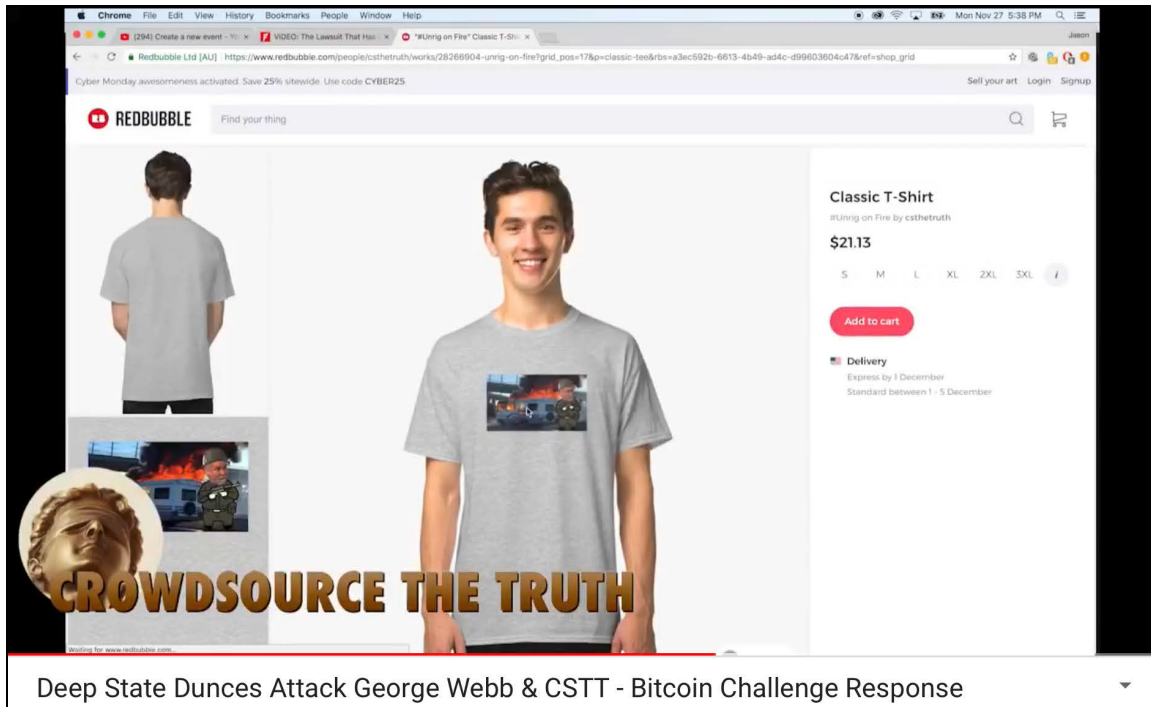
45. On November 27, 2017, for instance, Goodman published a video on YouTube entitled, “**Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response**”. The video opens with the following insulting picture and words:<sup>6</sup>



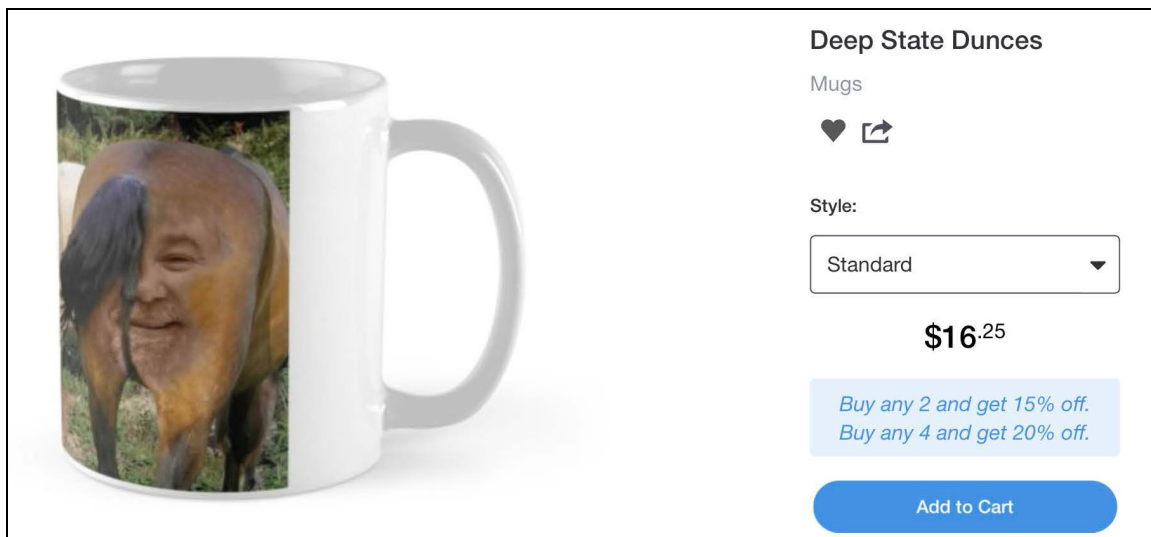
In this video, Goodman revealed that “Red Bubble<sup>7</sup> is the website that all the Crowdsourcethe Truth merchandise is available on”. Goodman went on a verbal tirade in which he claimed that it was his First Amendment right to “express my opinion that a Robber Who Steals is a [sic] IDIOT, such a dummy, such a loser, and you know what, losers lose, that’s what they do.” The **Deep State Dunces** video shows that Goodman and CSTT sold or were selling t-shirts using Robert’s picture:

<sup>6</sup> The other persons depicted in the picture are Manuel Chavez (the pig) and Dave Acton (in the straight-jacket). Dave Acton a/k/a David Sweigert is the brother of George Webb.

<sup>7</sup> “Red Bubble” is a website that advertises for sale products that are designed by “independent artists”. CSTT advertises and sells its merchandise through Red Bubble.



Goodman and CSTT were also selling coffee mugs with Robert's picture on them, e.g.:



[<https://www.redbubble.com/i/mug/Unrig-on-Fire-by-csthetruth/28266904.9Q0AD>].

46. Goodman knowingly misappropriated Robert's name and picture. He created the provocative memes and designed the insulting t-shirts and mugs. He supplied descriptive language to be included on the Redbubble website (e.g., the phrase "*The fraudulent efforts of the Robber David who Steals are going up in flames*"). He

supplied search terms and instructed Redbubble to code its website to tag Robert's name, <https://www.redbubble.com/shop/robert+david+steele>; <https://www.redbubble.com/i/t-shirt/Unrig-on-Fire-by-csthetruth/28266904.0S66D>.

47. Goodman knowingly used Robert's name and picture in violation of § 8.01-40 of the Code.

48. Robert suffered damages resulting from Goodman's unlawful use of Robert's name and picture. He seeks damages for injuries sustained by of Goodman's unlawful use, disgorgement of all income received by Goodman from or as a result of Goodman's unlawful use, an injunction to prevent and restrain further use of Robert's name and picture, punitive damages in the maximum amount allowed by law, and costs.

Plaintiffs allege the foregoing based upon personal knowledge, public statements of others, and records in their possession. Plaintiffs believe that substantial additional evidentiary support, which is in the exclusive possession of Goodman, Negron, Holmes and their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Plaintiffs reserve the right to amend this Complaint upon discovery of additional instances of Goodman's defamation and wrongdoing.

### **CONCLUSION AND REQUEST FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request the Court to enter Judgment against Goodman as follows:

A. Compensatory damages in the sum of \$1,000,000.00;

- B. Three-fold Damages in accordance with § 18.2-500 of the Virginia Code in the total sum of \$3,000,000.00;
- C. Punitive damages in the amount of \$350,000.00 or the maximum amount allowed by law;
- D. Prejudgment interest at the maximum rate allowed by law from;
- E. Postjudgment interest at the rate of six percent (6%) per annum until paid;
- F. Attorney's Fees pursuant to § 18.2-500 of the Code in an amount to be determined in accordance with Rule 54(d)(2);
- G. Such other relief as is just and proper.

**TRIAL BY JURY IS DEMANDED**

DATED: November 26, 2021

KATHY STEELE, Administrator of the Estate of  
Robert David Steele  
EARTH INTELLIGENCE NETWORK

By: /s/ Steven S. Biss  
Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2021 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendant Goodman.

By: /s/ Steven S. Biss  
Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiffs*



**EXHIBIT TWO**

## Tracking The Leopard Meroz

a christian commentary on the curse of Judges 5:23, because they came not to the help of the LORD, against the mighty

## Tut, Tut, The Queen of Falsification, Susan A. (Lutzke) Holmes, is Arrested Again

Posted on **December 2, 2021**

Since 2017, I have written at least 8 full length articles on Queen Tut, the former regular guest of Jason Goodman's *Crowdsource the Truth* You Tube channel, who was later revealed to be Susan A. (Lutzke) Holmes.



She was sued by Robert David Steele and Earth Intelligence Network on September 1, 2017 in a federal defamation lawsuit against Jason Goodman, Patricia Negron, and Queen Tut for their remarks made on several *Crowdsource the Truth* shows. Susan Lutzke/Holmes lost that lawsuit by default, after she refused to answer the legally served complaint; instead, preferring to submit to the court a falsified document. Co-defendant Negron settled with Steele, and that defamation complaint was refiled against Jason Goodman and is still an active case.

Susan A. Lutzke/Holmes used to comment on this blog under numerous anonymous handles. When she submitted a comment using the name of Robert David Steele, I refused to allow her to continue commenting, which caused her to retaliate by falsifying articles in my name.

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On March 4, 2020, I provided a notice on this blog, titled *The Impersonation of Tracking the Leopard Meroz by Susan Holmes' Medium.com/The Hudson Report Website.*

One week later, I discussed Susan Holmes' arrest for perjury on a Red Flag law application. While livestreaming with a Second Amendment supporter of Holmes, the police broke into her residence and took her into custody. I noted this event in a March 11, 2020 article, *The Folie A Deux of Patricia Negron and Susan Holmes aka Queen Tut.*



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More recently, on November 23, 2021, Austin Fleskes of the Loveland Reporter-Herald wrote an article headlined, *Susan Holmes charged with jury tampering in addition to perjury case*, saying, “Holmes, 66, has been **charged with perjury** and attempting to influence a public servant in a case stemming from her filing of a “red-flag” petition against Cpl. Philip Morris, a Colorado State University police officer who, with a Fort Collins Police Services officer, shot and killed her son, Jeremy Holmes, in 2017. Former District Attorney Cliff Riedel has **ruled that the shooting was justified.**”

The Reporter-Herald added, “According to court records, Holmes now faces two felony cases: the original case, which includes charges of attempt to influence a public servant, a class 4 felony; and first-degree perjury, a class 4 felony; and the new case that charges Holmes with two counts of tampering with a jury, a class 5 felony. She also faces two misdemeanor cases as well.”

In a another article dated November 30, 2021, *Bonds Set in Perjury, Contempt cases against Fort Collins woman after out-of state arrest*, Fort Collins Coloradoan writer, Sady Swanson noted that Susan Holmes was arrested in Logan, New Mexico, in early November, after she had missed four court appearances, including two misdemeanor cases, a perjury case, and a contempt of court case. This resulted in four warrants being issued for her arrest.



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Swanson related, that “Holmes gave law enforcement her maiden name and, when asked, said she had never been to Colorado ‘in an apparent attempt to avoid detection’.” Senior Deputy District Attorney Robert Axmacher “added Holmes appears to have ‘abandoned her permanent residence’ in Fort Collins.”

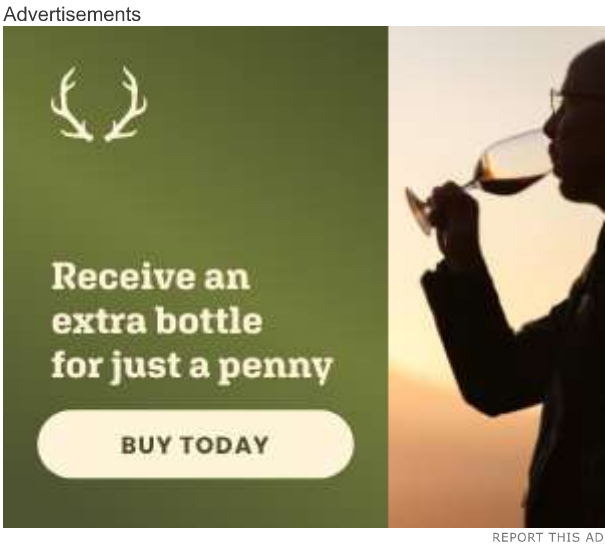
Of interest is that Susan “Holmes’s previous attorney had withdrawn from her perjury case after Holmes allegedly had contact with a potential juror during the first day of jury selection in her August trial. A potential juror told Holme’s attorney at the time that the defendant had contact with them during the lunch break. The attorney was legally obligated to report the allegation to the court, which ‘understandably’ upset Holmes, according the court documents.”

“The conflict immediately forced a separate hearing held in front of a different judge -Judge Juan Villaseñor – outside the presence of the jury pool and prior to the mistrial being declared. Villaseñor wrote in his order, Holmes allegedly continuously interrupted Villaseñor and others despite several warnings to stop, and acted in ‘a disrespectful and disruptive manner’. For that, Villaseñor found Holmes in contempt.”

“Susan Holmes has been sitting in a Larimar County Jail cell, and will have to post bond in both the perjury and contempt of court cases to be released from custody.”



A partial review of the backstory on the death of Susan Holmes’ son Jeremy Holmes can be found in the March 29, 2018 *Tracking the Leopard Meroz* article, *The Amending of a Lawsuit to Include Susan (Holmes) Lutzke, as Queen Tut*.



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This entry was posted in **Antigovernment/Sovereign Citizens/Tax Protestors/ Anti-CPS, Conspiracy Media, Cyberstalking, Port of Charleston Shutdown June 14, 2017 and other issues related to Jason Goodman's Crowdsource the Truth show, Robert David Steele/Earth Intelligence Network vs. Jason Goodman, Patricia Negron and Queen Tut/Susan Lutzke** and tagged **Jeremy Holmes death, Queen Tut aka Susan Holmes, Queen Tut aka Susan Lutzke, Queen Tut of Crowdsource the Truth, Red Flag Law Abuses, Robert David Steele v Jason Goodman lawsuit, Susan A. Holmes, Susan A. Lutzke by Jacquelyn Weaver**. Bookmark the **permalink [https://trackingmeroz.wordpress.com/2021/12/02/tut-tut-the-queen-of-falsification-susan-a-lutzke-holmes-is-arrested-again/]** .

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